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May 28, 2020

Judge Nelson S. Román
United States District Court
300 Quarropas Street
White Plains, New York 10601

Re: Nurse Anonymous v. Good Samaritan Hospital et al., 20-cv-03119 (NSR)

Dear Judge Román:

I represent Plaintiff in this action. I will be soon file a motion for plaintiff's continued anonymity (tomorrow, or by the latest, Monday). Since plaintiff's declaration is replete with personal information that the motion would seek to keep anonymous, I seek permission to file that declaration under seal. I will also file a declaration that does not have to be filed under seal (as well a non-confidential notice of motion). My memorandum will contain portions that I would need to file under seal in order not to defeat the purpose of the motion. The memo I will be able to redact in part and file publicly, though I have not finished it and cannot so determine what amount at this time.

Therefore, I ask to file papers – two in particular – under seal, though the memo I can redact in part and file the redacted brief under seal. Plaintiff's declaration is replete with information that contains information that plaintiff seeks to remain under seal. A minority of the information contained in the declaration could be filed publicly, though I think it would be a useless, mostly redacted document were I to file it in redacted form.

Under a sealing order effective February 3, 2020, I must make this motion before filing and receive permission. Since a public filing of the motion would defeat the purpose of the motion, I ask for leave to file plaintiff's declaration and a memo of law under seal, with a redacted memorandum to follow the complete filing.

Thank you for your consideration.

Sincerely,

Greg S. Antollino

Gregory Antollino

Cc: Allison B. Gotfried, Brian Clark (by ecf)